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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

DELL INC. and DELL PRODUCTS L.P.,  
Plaintiffs,

v.

PHILIPS ELECTRONICS NORTH AMERICA  
CORPORATION, *et al.*,  
Defendants.

Master File No. 3:07-cv-05944-SC

MDL No. 1917

Individual Case No. 3:13-cv-02171-SC

**DECLARATION OF MATTHEW D.  
KENT IN SUPPORT OF DELL'S  
ADMINISTRATIVE MOTION TO  
FILE DOCUMENTS UNDER SEAL**

1 I, **MATTHEW D. KENT**, declare as follows:

2 1. I am an attorney with the law firm of Alston & Bird LLP, counsel for Plaintiffs Dell Inc.  
3 and Dell Products L.P. (collectively, "Dell") in the above-captioned action currently pending in the  
4 U.S. District Court for the Northern District of California. I submit this declaration in support of Dell's  
5 Administrative Motion to File Documents Under Seal, related to Dell's Reply in Support of Motion for  
6 Discovery Order and to Strike Errata ("Reply Discovery Motion"). I have personal knowledge of the  
7 facts stated herein, and I could and would competently testify thereto if called as a witness.

8 2. I am a member in good standing of the State Bar of Georgia and am admitted to practice  
9 before the U.S. District Court for the Northern District of Georgia. I have also been admitted to this  
10 Court *pro hac vice* as counsel for Dell pursuant to the Court's Pretrial Order No. 1 in the MDL  
11 Proceeding.

12 3. Pursuant to Civil Local Rules 7-11 and 79-5, and in accordance with this Court's  
13 General Order No. 62, effective May 10, 2010, Dell, by and through their counsel, respectfully request  
14 an Order permitting it to file under seal portions of the Reply Discovery Motion and Exhibits 1 and 2  
15 to the Reply Declaration of James M. Wagstaffe in Support of Dell's Discovery Motion ("Wagstaffe  
16 Declaration").

17 4. Exhibit 1 to the Wagstaffe Declaration is an excerpt from the transcript of the  
18 Deposition of Yasuki Yamamoto, July 1-3, 2013, designated by Toshiba as Highly Confidential.

19 5. Exhibit 2 to the Wagstaffe Declaration is an excerpt from the transcript of the  
20 Deposition of Jae In Lee, July 24, 2013, designated by Samsung SDI as Highly Confidential.

21 6. Dell's Discovery Motion and Exhibits 1 and 2 refer to or contain excerpts from  
22 documents that Counsel for Defendants have as "highly confidential" under the Stipulated Protective  
23 Order [Docket Nos. 306, 1142].

24 7. Accordingly, Dell requests that the documents identified herein be filed under seal.  
25

26 Date: November 5, 2013  
27  
28

Respectfully submitted,

By: /s/ Matthew D. Kent

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